## RECEIVED

JAN 2 4 2005

JAN & 4 ZUUD

PUBLIC SERVICE COMMISSION TELEPHONE

TELEPHONE
(270) 826-3965
TELEFAX
(270) 826-6672
www.dkgnlaw.com

# DORSEY, KING, GRAY, NORMENT & HOPGOOD ATTORNEYS-AT-LAW

JOHN DORSEY (1920-1986)
FRANK N. KING, JR.
STEPHEN D. GRAY
WILLIAM B. NORMENT, JR.
J. CHRISTOPHER HOPGOOD
S. MADISON GRAY

318 SECOND STREET
HENDERSON, KENTUCKY 42420

January 21, 2005

### VIA FIRST CLASS MAIL AND FAX NO. 502-564-7279

Ms. Elizabeth O'Donnell
Executive Director
Public Service Commission of Kentucky
Post Office Box 615
Frankfort, Kentucky 40602

Re:

Case No. 2004-00319

Dear Ms. O'Donnell:

Enclosed for filing is Motion for Extension of Time being filed on behalf of the applicant. Please note that the present deadline that is being requested to be extended is January 28, 2005, and opposing counsel do not object to this motion.

As discussed with staff counsel Anita Mitchell a telephonic informal conference is to be set for Wednesday, January 26, 2005, at 9:30 A.M., EST. I understand that an order will be entered setting this informal conference. Telephone numbers for counsel are as follows:

Gardner F. Gillespie

- (202) 637-8796

John Selent and

Holly Wallace

- (502) 540-2315

Frank N. King, Jr.

- (270) 826-3965

Your assistance in this matter is appreciated.

Very truly yours,

DORSEY, KING, GRAY, NORMENT & HOPGOOI

By

Frank N. King, Jr.

FNKJr/cds-Encls. COPY/w/encls.:

Anita Mitchell, Staff Counsel

Service List

Jackson Purchase

#### COMMONWEALTH OF KENTUCKY BEFORE THE PUBLIC SERVICE COMMISSION

PUBLIC SERVICE

In the Matter of:

APPLICATION OF JACKSON PURCHASE	)
ENERGY CORPORATION FOR	)
ADJUSTMENTS IN EXISTING CABLE	)CASE NO. 2004-00319
TELEVISION ATTACHMENT TARIFF	)

#### MOTION FOR EXTENSION OF TIME

Now comes **JACKSON PURCHASE ENERGY CORPORATION** ("JPEC"), by counsel, and moves the Commission to extend the time for responding to initial data requests from January 28, 2005, to February 11, 2005. As grounds, JPEC states that counsel are engaged in discussions regarding issues and matters relevant to the case, including the possibility of settlement. JPEC should not be required to expend time and incur expense in preparing responses while such discussions are ongoing.

The undersigned is authorized to inform the Commission that opposing counsel do not object to this motion.

If this motion is granted, the Commission should also reschedule the deadlines for serving and responding to supplemental data requests to correspond to the extended time being requested herein.

WHEREFORE, JPEC moves the Commission for extension of time as set forth above and further requests all proper relief.

DORSEY, KING, GRAY, NORMENT & HOPGOOD 318 Second Street Henderson, Kentucky 42420 Telephone (270) 826-3965 Telefax (270) 826-6672

Attorneys for Jackson Purchase Energy Corporation

Frank N. King. Jr

#### CERTIFICATE OF SERVICE

I hereby certify that the foregoing has been served upon the Attorney General of Kentucky, Office of Rate Intervention, 1024 Capital Center Drive, Frankfort, KY 40601; Gardner F. Gillespie, Hogan & Harston, L.L.P., 555 Thirteenth Street, Washington, D.C. 20004-1109, and Frank F. Chuppe, Wyatt, Tarrant & Combs, LLP, 500 West Jefferson Street, Suite 2600, Louisville, KY 40202, attorneys for Kentucky Cable Telecommunications Association; and John E. Selent and Holly C. Wallace, Dinsmore & Shohl, LLP, 1400 PNC Plaza, 500 West Jefferson Street, Louisville, KY 40202, attorneys for Ballard Rural Telephone Cooperative Corporation, Inc., by mailing a true and correct copy of same on this 21<sup>st</sup> day of January, 2005.

counsel for Jackson Purchase Energy Corporation

After 5 days, return to:

DORSEY, KING, GRAY, NORMENT & HOPGOOD Attorneys at Law 318 Second Street Henderson, Kentucky 42420



NITED STATES POSTAL SERVICE :





JAN 24 2005 Public Service Commission of Kentue版CEIVED Frankfort, Kentucky 40602 Ms. Elizabeth O'Donnell Post Office Box 615 **Executive Director** 

PUBLIC SERVICE COMMISSION

www.usps.com